

23-09191MB(MAA)

AFFIDAVIT

I, William P. Akins, a Postal Inspector with the United States Postal Inspection Service (USPIS), being duly sworn, depose and state:

INTRODUCTION:

1. I am a Postal Inspector with the United States Postal Inspection Service, in Tucson, AZ, and have been employed as such since February of 2019. Since February of 2019, I have been stationed at the Tucson, Arizona office of the Phoenix Division. I attended the fourteen-week training course at the United States Postal Inspection Service Academy in Potomac, Maryland. There I received training related to violations of federal law including assaults, robberies, and criminal investigations of narcotics trafficking via the United States Mail. Prior to becoming a Postal Inspector, I was employed as a United States Border Patrol Agent for approximately 13 years. Throughout my law enforcement career, I have had extensive training and experience investigating a variety of criminal violations including controlled substances. During my 17-year career as a Federal Law Enforcement Officer, I have been involved in numerous criminal investigations which have resulted in arrests, recovery of evidence and seizure of property. I have also written and executed numerous search warrants resulting in the seizure of thousands of dollars and controlled substances.

DESCRIPTION OF SUBJECT PARCEL:

2. This affidavit is made in support of an Application and Affidavit for Search Warrant for a United States Postal Service (USPS) Priority Mail (PM) parcel. The parcel has tracking number 9405 5362 0624 8560 4534 89, with prepaid postage, postmarked from Phoenix, Arizona, on October 30, 2023. It bears a return address of “Kris Hanson, 1017 S 151st Ln, Goodyear, AZ 85338” and is addressed to “Craig Robertson, 59697 Twin Pines Dr, New

Hudson, MI 48165-8114". It is hereafter referred to as the "TARGET ADDRESS". The article consists of a USPS PM small flat rate box. The parcel measures approximately 9" x 5" x 2" and weighs 1 pound and 5 ounces. It is hereafter referred to as "SUBJECT PARCEL 1".

BACKGROUND ON USPS DRUG INTERDICTION IN SOUTHERN ARIZONA AND THE USPS DRUG MAIL PROFILING PROGRAM:

3. From my training, personal experience, and the collective experiences related to me by other Postal Inspectors who specialize in investigations relating to the mailing of controlled substances and the proceeds from the sale of controlled substances, I am aware that the southern Arizona international border is a leading area for the entry of controlled substances from Mexico into the U.S. Based on the large quantities of controlled substances entering southern Arizona, controlled substances are frequently transported from southern Arizona via the United States Mail to areas across the United States, primarily to the large metropolitan areas in the eastern United States and Puerto Rico. It is also common for the proceeds from the sale of the controlled substances to be sent to southern Arizona via the United States Mail. By using the U.S. Mail to ship controlled substances, these drug traffickers put unknowing postal employees who handle and deliver those mailings at risk.
4. Based on the frequent use of the United States Mail for the shipment of controlled substances from southern Arizona and California, Postal Inspectors in Tucson and other locations near the southwest border routinely observe inbound and outbound mail articles for suspicious characteristics common to mailings of drugs and drug proceeds. While there are many characteristics that experienced inspectors look for, the most common characteristics found are:

- a. Suspected parcels are mailed to or from known drug destination areas, primarily the large metropolitan areas in United States and Puerto Rico.
 - b. The sender names and addresses on drug or drug proceeds parcels routinely contain misspellings, incomplete, inaccurate, unauthorized and/or fictitious information.
 - c. A tracking number is used to provide the trafficker the ability to track the parcel's progress to the point of delivery.
 - d. The postage was paid with a means which leaves no trail identifying the mailer.
5. Parcels found to meet some or all of the suspicious characteristics described in subsections "a" through "d" of this paragraph are further investigated by Postal Inspectors.

INVESTIGATIVE DETAILS:

6. Since September of 2021, I have reviewed United States Postal Service (USPS) business records detailing outbound parcels using prepaid postage in Tucson, Arizona. After reviewing the report, there appeared to be a connection between various names and addresses utilized as the return address information.
7. A Drug Enforcement Agency (DEA) Analyst and I utilized law enforcement and USPS databases to learn some receiving addresses received multiple parcels from different return names which appeared on the same business record. These names all utilized different return addresses as well. The data showed the sender could be concealing his or her identity because the parcels contain an illegal substance.
8. During the course of the investigation, Agents and I identified a courier for a drug trafficking organization (DTO) who primarily ships steroids across the country. Steroids are a Schedule III controlled substance.

9. On September 19, 2023, I was made aware a USPS PM parcel was mailed at the Cortaro Post Office by the subject we previously identified as shipping steroids. Steroids are illegal to mail if the sender is not a licensed medical practitioner. The subject has been identified and he is not a licensed medical practitioner.
10. The parcel mailed by the suspect had tracking number 9505 5120 3143 3261 2023 56, with \$10.20 in postage, postmarked from Tucson, Arizona, on September 18, 2023. It had a return address of “Kevin Sterling, 1330 Willow Run Dr., Tucson AZ 85710” and was addressed to “Brad Pippin, 1200 N Yellowwood Ave, Broken Arrow OK 74012”. The article consisted of a USPS PM small flat rate box. The parcel measured approximately 9” x 5” x 2” and weighed approximately 8.40 ounces. It is hereafter referred to as “SUBJECT PARCEL 2”.
11. On September 20, 2023, I opened and searched “SUBJECT PARCEL 2” pursuant to a federal search warrant (23-03189MB) signed by United States Magistrate Judge Angela M. Martinez. Inside “SUBJECT PARCEL 2” were 180 grams of steroids.
12. On October 18, 2023, law enforcement agents were conducting surveillance on the same suspect and witnessed him enter the Mountain View Post Office in Tucson, Arizona.
13. On October 18, 2023, I contacted a USPS supervisor at the Mountain View Post Office and requested the parcels mailed by the suspect be set aside for further investigation.
14. One of the parcels set aside for further investigation was a USPS PM parcel. The parcel had tracking number 9405 5362 0624 8515 1539 07, with prepaid postage, postmarked from Tucson, Arizona, on October 18, 2023. It had a return address of “Jason Jenkins, 6647 N Campbell Ave, Tucson AZ 85718” and was addressed to “John Warren, 271 Faith Ave, Jacksonville, AL 36265-5905”. The article consisted of a USPS PM small flat rate box. The

parcel measured approximately 9" x 5" x 2" and weighs 8.50 ounces. It is hereafter referred to as "SUBJECT PARCEL 3".

15. On October 19, 2023, I opened and searched "SUBJECT PARCEL 3" pursuant to a federal search warrant (23-07634MB) signed by United States Magistrate Judge Lynnette C. Kimmins. Inside "SUBJECT PARCEL 3" were 200 grams of steroids.
16. On October 25, 2023, law enforcement agents were conducting surveillance in Coolidge, Arizona on potential co-conspirators for this DTO. A vehicle associated to the known shipper of steroids was located at one the residences where surveillance was being conducted.
17. On October 25, 2023, law enforcement agents observed an unknown male subject exit the residence and enter a vehicle. The suspect was observed driving to the Coolidge Post Office and entering the Post Office. One of the law enforcement agents entered the Post Office a few minutes after the suspect exited and observed several USPS PM parcels on the retail counter of the Post Office.
18. On October 25, 2023, I spoke with a USPS supervisor at the Coolidge Post Office and requested one of the parcels mailed by the unidentified suspect be sent to my office for further investigation.
19. The parcel set aside had tracking number 9405 5362 0624 8545 4848 35, with prepaid postage, postmarked from Coolidge, Arizona, on October 25, 2023. It had a return address of "Kyle Hook, 7765 W Summer Sky Dr, Tucson, AZ 85743" and was addressed to "Derek Faulkner, 119 Clark Mills Rd, Dayton, ME 04005-7120". The article consisted of a USPS PM small flat rate box. The parcel measured approximately 9" x 5" x 2" and weighed 6.70 ounces. It is hereafter referred to as "SUBJECT PARCEL 4".

20. On October 31, 2023, I opened and searched “SUBJECT PARCEL 4” pursuant to a federal search warrant (23-09160MB) signed by United States Magistrate Judge Michael A. Ambri. Inside “SUBJECT PARCEL 4” were 136 grams of steroids.
21. On October 31, 2023, I was made aware of “SUBJECT PARCEL 1.” Based on knowledge acquired through the investigation, I believe another courier for this DTO mailed “SUBJECT PARCEL 1” out of the Phoenix area of Arizona.
22. On October 31, 2023, I requested “SUBJECT PARCEL 1” be sent to my office for further examination.
23. On November 1, 2023, I utilized USPS databases to learn on September 20, 2023, a previous parcel was mailed to the “TARGET ADDRESS” which utilized the same return address as “SUBJECT PARCEL 1” but used the name of “James Cutter” not “Kris Hanson”. This is also very common for this DTO to change certain aspects of the sender information on the mailing label.
24. On November 1, 2023, I received an image “SUBJECT PARCEL 1” and learned the following:
 - a. It was mailed from Phoenix, Arizona which is a source area for narcotics.
 - b. It had a tracking number. From my experience, I know that nearly all drug and drug proceeds parcels bear tracking numbers allowing the sender and receiver to track the progress of the shipment from origination to destination.
 - c. The subject parcel was paid for in a manner to conceal the identity of the mailer.
 - d. The subject parcel had similar characteristics of previous parcels which contained steroids: USPS small flat rate box, the return address was fictitious, and the weights were similar.
25. On November 1, 2023, I accessed “Thomson Reuters CLEAR” to check for records of the names and addresses listed on “SUBJECT PARCEL 1”. Thomson Reuters CLEAR is an online service that provides an extensive collection of public records used primarily by corporate security departments and law enforcement agencies nationwide for investigative purposes. There were no current records associating the sender or receiver with the corresponding addresses listed on the “SUBJECT PARCEL 1”.

26. On November 1, I utilized USPS databases to learn the return address listed on “SUBJECT PARCEL 1” is fictitious. It is not a real, deliverable address.

27. Canine Examination:

- a. A canine was not requested for “SUBJECT PARCEL 1” because I believe SUBJECT PARCEL 1 contains steroids. Steroids are also odors detection canines are not trained to detect.

28. Based on the facts set forth in this affidavit, I believe there is probable cause to show that “SUBJECT PARCEL 1” contains controlled substances, constituting evidence of violations of 21 U.S.C. § 841 (a) (1), Possession with Intent to Distribute a Controlled Substance; 21 U.S.C. § 843 (b), Unlawful Use of a Communication Facility to Facilitate the Distribution of a Controlled Substance; and 21 U.S.C. § 846, Conspiracy to Possess with Intent to Distribute a Controlled Substance.

29. This affidavit is submitted for the limited purpose of seeking authorization to search “SUBJECT PARCEL 1”. Your Affiant has not set forth each and every fact known to him regarding the investigation.

William P. Akins

William P. Akins
United States Postal Inspector

Subscribed and sworn to me telephonically on
This 2nd day of November, 2023



Michael A. Ambri
United States Magistrate Judge